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## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF VIRGINIA HARRISONBURG DIVISION

IN RE:	AMANDA LEE WEAVER COLLINS	)	
		)	CHAPTER 7
	DEBTOR.	)	CASE NO. 20-50136

## MOTION TO QUASH GARNISHMENT

Comes now your applicant, **AMANDA LEE WEAVER COLLINS**, by Counsel, pursuant to Bankruptcy Code §362 (a), and respectfully represents:

- 1. That your applicant has filed a petition for relief under Chapter 7 of Title 11 of the United States Code;
- 2. That your applicant is subject to a garnishment issued by: SHENANDOAH COUNTY GENERAL DISTRICT COURT, 215 MILL ROAD STE. 128, WOODSTOCK, VA 22664, within 90 days of the filing of the above named petition;
- 3. That said garnishment is in favor of: SKY BRYCE ASSOCIATION/CHADWICK WASHINGTON MORIARTY ELMORE & BUNN, 201 CONCOURSE BLVD. STE.101, GLEN ALLEN, VA 23059.
- 4. The GARNISHEE is: SHEETZ INC, ATTN: PAYROLL, 5700 SIXTH AVE., ALTOONA, PA 16602;
- 5. The creditor is attempting to garnish: **DEBTOR'S WAGES**.

WHEREFORE, your applicant prays that said garnishment be quashed and have such other and further relief as the nature of the case may require.

Date: February 24, 2020 Respectfully submitted,

By: <u>/s/ David Cox</u>

Counsel for Debtor

COX LAW GROUP, PLLC 900 LAKESIDE DRIVE, SUITE A LYNCHBURG, VA 24501 (434) 845-2600

Certificate of Service

I certify on February 24, 2020 I have sent by postage prepaid, first class U.S. Mail this pleading to the Debtor; the Garnishee: SHEETZ INC, ATTN: PAYROLL, 5700 SIXTH AVE., ALTOONA, PA 16602; the Court: SHENANDOAH COUNTY GENERAL DISTRICT COURT, 215 MILL ROAD STE. 128, WOODSTOCK, VA 22664; and the Creditor: SKY BRYCE ASSOCIATION/CHADWICK WASHINGTON MORIARTY ELMORE & BUNN, 201 CONCOURSE BLVD. STE.101, GLEN ALLEN, VA 23059.

/s/\_David Cox Counsel for Debtor